



California Regional Water Quality Control Board

Santa Ana Region



Alan C. Lloyd, Ph.D.
Agency Secretary

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Arnold Schwarzenegger
Governor

November 29, 2005

Mr. Peter H. Wulfman, Division Manager
Solid Waste Management Division
County of San Bernardino Department of Public Works
222 West Hospitality Lane, Second Floor
San Bernardino, CA 92415-0017

PROPOSED GROUNDWATER MONITORING PROGRAM, CLEANUP AND ABATEMENT ORDER (CAO) NO. R8-2003-0013

Dear Mr. Wulfman:

We have reviewed the proposed groundwater monitoring program for perchlorate and volatile organic compounds (VOCs) associated with the groundwater plume emanating from the County's property in the Rialto area, which we received on August 16, 2005. The proposed groundwater monitoring program was prepared by your consultant, GeoLogic Associates (GLA), and was submitted to monitor the lateral and vertical extent of the perchlorate plume and to monitor implementation of the remedial action plan required by Cleanup and Abatement Order (CAO) No. R8-2003-0013, as amended by Order No. R8-2004-0072. The proposed monitoring program includes quarterly groundwater sampling of:

- Six extraction wells (not yet constructed) associated with the groundwater treatment system;
- Five near-field wells (M-1, M-2, M-3, M-4 and N-14); and
- Seven plume-wide wells (F-6A, N-7, N-8, N-10, N-11, N-13 and N-15).

Prior to implementing quarterly sampling, the extraction wells are proposed to be sampled weekly for the first two months of operation, then monthly for the next 4 months. Also, M-1, M-2 and N-14 are proposed to be sampled monthly for the first 6 months of full extraction well operation prior to implementing the quarterly sampling. All sampling events will include analyses for perchlorate and VOCs. In addition, samples from the near-field and plume-wide wells (with the exception of M-2 and M-3) will be analyzed for semi-volatiles, NDMA, CAM-17 Metals, Title 22 general minerals, nitrate, sulfate, pesticides, and herbicides on an annual basis.

Groundwater elevation measurements will be obtained at all monitoring wells during sampling events. In addition, groundwater elevation measurements will be obtained on a quarterly basis from piezometers F-3, N-1 through N-6, N-8 and N-12. Quarterly reports are proposed to be submitted by January 31, April 30, July 30 and October 30. The annual report is proposed to be submitted on January 31.

The proposed monitoring program and reporting schedule is approved, with the addition that monitoring well N-12 be included in the monitoring program as a plume-wide well. By December 12, please submit a revised table, similar to the Sampling Schedule table included on page 3 of your proposal, which includes monitoring well N-12 as a plume-wide well. The

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table should also include the schedule for water level measurements. Also, the Frequency column should identify the long-term monitoring frequencies, and the footnotes should describe the more frequent, initial monitoring frequencies. The purpose of this revised table is to clearly describe all events that will occur under the approved monitoring program.

The plume-wide wells were last sampled in November 2004 and some of the monitoring wells have been dry since October 2004. Therefore, sampling and water level measurements for all of the wells and piezometers scheduled for quarterly and annual monitoring must be performed immediately to assure that the analytical data will be submitted by January 31, 2006. As with past monitoring activities, please continue to coordinate all water elevation measurement events with GeoSyntec's monitoring of wells PW-1 through PW-4 and TW-1 for Goodrich Corporation. In addition, for your information, we are attaching comments that were provided on your proposed monitoring program by Komex, on behalf of the Fontana Water Company and West Valley Water District.

If you have any questions, please contact Robert Holub, Division Chief, at (951) 782-3298, or you may call me at (951) 782-3284.

Sincerely,



Gerard J. Thibeault
Executive Officer

Enclosure: Komex comment letter

cc: (w/o enclosure)
Regional Board
Jorge Leon, SWRCB, Office of Chief Counsel
Gary Lass, GeoLogic Associates (San Bernardino Office)
Inland Empire Perchlorate Regulatory Task Force Members (mailing list attached)

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